

Verification of Declaration of Adherence

Declaring Company: SAP SE



EU
CLOUD
COC

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1 Verification against v2.11 of the EU Cloud CoC

This Declaration of Adherence was against the *European Data Protection Code of Conduct for Cloud Service Providers* (**'EU Cloud CoC'**)¹ in its version 2.11 (**'v2.11'**)² as of December 2020.

Originally drafted by the Cloud Select Industry Group³ (**'C-SIG'**) the EU Cloud CoC – at that time called C-SIG Code of Conduct on data protection for Cloud Service Providers – was developed against Directive 95/46/EC⁴ and incorporated feedback by the European Commission as well as Working Party 29. Following an extensive revision of earlier versions of Code and further developing the substance of the Code (v2.11) and its provisions has been aligned to the European General Data Protection Regulation (**'GDPR'**)⁵.

2 List of declared services

2.1 SAP SuccessFactors Employee Central Payroll⁶

SAP SuccessFactors Employee Central Payroll - SAP SuccessFactors Employee Central Payroll can help you simplify payroll operations, reduce risk, and manage payroll seamlessly in the cloud. The solution supports gross to net payroll processing, with built-in retro calculation and off-cycle support, tax and remittance processing, bank transfers, reporting, year-end processing, and is localized for more than 50 countries.⁷

2.2 SAP SuccessFactors HCM System⁸

The SAP SuccessFactors HCM System includes a complete set of integrated talent management solutions, workforce analytics and planning, and a core HR solution.

The SAP SuccessFactors HCM System provides the following solutions⁷:

- **SAP SuccessFactors Workforce Analytics** — The SAP SuccessFactors Workforce Analytics solution supports decision making by helping companies find answers to key questions about their workforce profile and challenges and providing guidance to help solve them.

¹ <https://eucoc.cloud>

² <https://eucoc.cloud/get-the-code>

³ <https://ec.europa.eu/digital-single-market/en/cloud-select-industry-group-code-conduct>

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:31995L0046>

⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>

⁶ <https://www.sap.com/products/hcm/employee-central-payroll.html>

⁷ **NOTE:** The content for the service description has been provided by the CSP and does not reflect any opinion of or assessment by the Monitoring Body.

⁸ <https://www.sap.com/products/hcm.html>

- **SAP SuccessFactors Workforce Scheduling** - Workforce Scheduling is a comprehensive solution designed to optimize workforce efficiency through smart scheduling that aligns labor to demand, matches skills, and ensures compliance.
- **SAP People Intelligence** - People Intelligence is a solution that is built on SAP Business Data Cloud and automatically transforms HR, skills, and broader business data—such as that from SAP SuccessFactors HCM and other connected sources—into readily available insights. Its primary goal is to help organizations drive improved people and business decisions.
- **SAP SuccessFactors Learning** — SAP SuccessFactors Learning combines formal, social, and extended learning content management and reporting. It facilitates compliance training and reporting to help organizations meet regulatory requirements.
- **SAP Jam** — **SAP Jam** is an enterprise collaboration platform that allows users to collaborate, share, and find information, including videos and screen captures. Jam also includes support for Microsoft Office documents and PDFs, which allows for discovery and commenting, even from a mobile phone or tablet. Additional features include polling, activity feeds, and public and private groups, which enable employees to crowd-source questions, discuss and debate ideas, and keep processes on schedule.
- **SAP SuccessFactors Recruiting** — SAP SuccessFactors Recruiting helps organizations to source talent, track job applicants, and manage candidate relationships. It provides the ability to access global job boards, build talent pools to find past applicants, and build branded career sites.
- **SAP SuccessFactors Onboarding** — SAP SuccessFactors Onboarding allows managers to leverage a step-by-step wizard to create a personalized onboarding plan for new hires. Accessing an onboarding portal, new hires connect with recommended tools, content, and colleagues. SAP SuccessFactors Onboarding also supports the cross-boarding and offboarding of employees.
- **SAP SuccessFactors Opportunity Marketplace** — SAP SuccessFactors Opportunity Marketplace is a solution designed to connect employees with personalized recommendations for growth and development. Opportunities in Opportunity Marketplace mostly originate from other SAP SuccessFactors products or modules, but users with proper permissions can also create and publish opportunities within Opportunity Marketplace itself. Check Data Sources for Opportunity Marketplace to understand where different opportunities are from. All these opportunities are grouped into several sections and presented on cards for users to glance at, consider, and grab.
- **SAP SuccessFactors Employee Central** — SAP SuccessFactors Employee Central provides a central location for all employee data to help HR measure the contribution of the workforce to

business results. SAP SuccessFactors Employee Central offers organizational management, global benefits administration, and team absence tracking. The solution is localized in 100+ countries.

- **SAP SuccessFactors Employee Central Service Center** — SAP SuccessFactors Employee Central Service Center is an HR help desk solution. Employees submit service tickets to receive assistance and information from HR service agents.
- **SAP SuccessFactors Enterprise Service Management** —Enterprise Service Management is AI-driven HR service management solution streamlines case handling, automates processes, and provides employees with efficient self-service tools
- **SAP SuccessFactors Time Tracking** — SAP SuccessFactors Time Tracking supports an organization's time administration strategy and enables employees to submit timesheets. The solution includes clock-in and clock-out, time account payouts and automated calculations and approvals.
- **SAP SuccessFactors Work Zone** — SAP SuccessFactors Work Zone is a digital workplace that provides access to relevant business applications and processes, information, and communication with a unified entry point for work. The solution guides employees through complex, end-to-end processes that span across multiple business applications.
- **SAP SuccessFactors Performance and Goals** — SAP SuccessFactors Performance and Goals provides a means to manage employee performance and tracks the performance review process and ongoing performance conversations between employees and managers.
- **SAP SuccessFactors Compensation** — SAP SuccessFactors Compensation enables planning and management of various types of compensation programs, including salary, merit increases, market adjustments, lump sum payments, and other discretionary pay components.
- **SAP SuccessFactors Succession and Development** — SAP SuccessFactors Succession and Development enables users to create and maintain development plans that are integrated with learning recommendations. The solution supports personalized plans with specific, measurable and time-framed (SMART) goals and supporting action items.
- **SAP SuccessFactors Career and Talent Development** — SAP SuccessFactors Career and Talent Development enables employees to define their career goals and receive personalized AI recommendations for skills, roles, learning opportunities, and more, all based on their skills data.
- **SAP SuccessFactors Employee Central Payroll** — SAP SuccessFactors Employee Central Payroll can help you simplify payroll operations, reduce risk, and manage payroll seamlessly in the cloud. The solution supports gross to net payroll processing, with built-in retro calculation and off-cycle support, tax and remittance processing, bank transfers, reporting, year-end processing, and is localized for more than 50 countries.

3 Verification Process - Background

V2.11 of the EU Cloud CoC has been developed against GDPR and hence provides mechanisms as required by Articles 40 and 41 GDPR⁹.

3.1 Approval of the Code and Accreditation of the Monitoring Body

The services concerned passed the verification process by the Monitoring Body of the EU Cloud CoC, i.e., SCOPE Europe srl/bvba¹⁰.

The Code has been officially approved in May 2021¹¹. SCOPE Europe has been officially accredited as Monitoring Body in May 2021¹². The robust and complex procedures and mechanisms can be reviewed by any third-party in detail at the website of the EU Cloud CoC alongside a short summary thereof.¹³

3.2 Principles of the Verification Process

Notwithstanding the powers of and requirements set out by the supervisory authority pursuant to Article 41 GDPR, the Monitoring Body will assess whether a Cloud Service, that has been declared adherent to the Code, is compliant with the requirements of the Code - especially as laid down in the Controls Catalogue. Unless otherwise provided by the Code, the Monitoring Body's assessment process will be based on an evidence-based conformity assessment, based on interviews and document reviews; proactively performed by the Monitoring Body.

To the extent the Monitoring Body is not satisfied with the evidence provided by a CSP with regards to the Cloud Service to be declared adherent to the Code, the Monitoring Body will request additional information. Where the information provided by the CSP appears to be inconsistent or false, the Monitoring Body will - as necessary - request substantiation by independent reports.

3.3 Multiple Safeguards of Compliance

Compliance of adherent services is safeguarded by the interaction of several mechanisms, i.e., continuous, rigorous, and independent monitoring, an independent complaints' handling process, and

⁹ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>

¹⁰ <https://scope-europe.eu>

¹¹ <https://www.gegevensbeschermingsautoriteit.be/publications/decision-n05-2021-of-20-may-2021.pdf>

¹² <https://www.gegevensbeschermingsautoriteit.be/publications/decision-n-06-2021-of-20-may-2021.pdf>

¹³ <https://eucoc.cloud/en/public-register/assessment-procedure/>

finally any CSP declaring services adherent is subject to substantial remedies and penalties in case of any infringement.

3.4 Process in Detail

It is expected that, prior to any assessment of the Monitoring Body, each CSP assesses its compliance internally. When declaring its service(s) adherent to the EU Cloud CoC, each CSP must elaborate its compliance with each of the Controls as provided by the Code considering the Control Guidance, as provided by the Controls Catalogue, to the Monitoring Body.

The CSP may do so either by referencing existing third-party audits or certifications, their respective reports and by free text responses. Additionally, the CSP will have to provide a general overview of the functionalities, technical, organisational and contractual frameworks of the service(s) declared adherent.

With regards to internationally recognised standards, the Monitoring Body will consider the mapping as provided by the Controls Catalogue. However, the Monitoring Body will verify whether (a) any third-party certification or audit provided by the CSP applies to the Cloud Service concerned, (b) such third-party certification or audit provided by the CSP is valid, (c) such third-party certification or audit has assessed and sufficiently reported compliance with the mapped controls of the third-party certification or audit concerned. Provided that the aforementioned criteria are met, the Monitoring Body may consider such third-party certifications or audits as sufficient evidence for the compliance with the Code.

Within Initial Assessments, the Monitoring Body selects an appropriate share of Controls that will undergo in-depth scrutiny, e.g., by sample-taking and requesting further, detailed information including potentially confidential information. Within any other Recurring Assessment, the Monitoring Body will select an appropriate share of Controls provided that over a due period every Control will be subject to scrutiny by the Monitoring Body. Where applicable, aspects of current attention at the time of assessment shall be covered too, e.g., where such aspects were indicated in media reports, publications or actions of supervisory authorities.

If the responses of the CSP satisfy the Monitoring Body, especially if responses are consistent and of appropriate quality and level of detail, reflecting the requirements of the Controls and indicating appropriate implementation by the Control Guidance, then, the Monitoring Body verifies the service(s) declared adhered as compliant and thereupon, makes them subject to continuous monitoring.

3.4.1 Levels of Compliance

V2.11 of the Code provides three different levels of Compliance. The different levels of compliance relate only to the levels of evidence that are submitted to the Monitoring Body. There is, however, no difference in terms of which parts of the Code are covered, since adherent Cloud Services have to comply with all provisions of the Code and their respective Controls.

3.4.1.1 First Level of Compliance

The CSP has performed an internal review and documented its implemented measures proving compliance with the requirements of the Code with regard to the declared Cloud Service and confirms that the Cloud Service fully complies with the requirements set out in this Code and further specified in the Controls Catalogue. The Monitoring Body verifies that the Cloud Service complies with the Code by information originating from the CSP.

3.4.1.2 Second Level of Compliance

Additional to the “First Level of Compliance”, Compliance with the Code is partially supported by independent third-party certificates and audits, which the CSP has undergone with specific relevance to the Cloud Service declared adherent and which were based upon internationally recognised standards procedures. Any such third-party certificates and audits that covered controls similar to this Code, but not less protective, are considered in the verification process of the Monitoring Body. Each third-party certificates and audits that were considered in the verification process by the Monitoring Body shall be referred in the Monitoring Body’s report of verification, provided that the findings of such certificates were sufficiently and convincingly reported and documented towards the Monitoring Body and only to the extent such certificates and audits are in line with the Code. The CSP must notify the Monitoring Body if there are any changes to the provided certificates or audits.

The Controls Catalogue may give guidance on third-party certificates and audits that are equivalent to certain Controls in terms of providing evidence of complying with the Code.

However, to those Controls that the CSP has not provided any equivalent third-party certificate or audit, the Monitoring Body verifies that the Cloud Service complies with the Code by information originating from the CSP.

The Monitoring Body may refuse application of Second Level of Compliance if third-party certificates and audit reports, that are recognised by the Monitoring Body in the verification process concerned, are not covering an adequate share of Controls of this Code; such adequate share shall be subject to the discretion of the Monitoring Body, considering e.g., the share related to the overall amount of Controls of the Code or whether a full Section or topic is being covered.

3.4.1.3 Third Level of Compliance

Identical to the “Second Level of Compliance” but Compliance is fully supported by independent third-party certificates and audits, which the CSP has undergone with regard to the Cloud Service declared adherent and which were based upon internationally recognised standards.

To the extent a CSP refers to individual reports, such as ISAE-3000 reports, the CSP shall ensure that such reports provide sufficient and assessable information and details on the actual measures implemented by the CSP regarding the Cloud Service concerned. The Monitoring Body shall, if considered necessary, in consultation with the Steering Board, define further requirements on such individual reports, such as accreditation and training for auditors against the provisions and requirements of this Code.

3.4.2 Final decision on the applicable Level of Compliance

When declaring its Cloud Service adherent, the CSP indicates the Level of Compliance it is seeking to achieve. Any final decision, whether a CSP is meeting the requirements of a specific Level of Compliance is at the sole discretion of the Monitoring Body.

3.5 Transparency about adherence

Each service adherent to the EU Cloud CoC must transparently communicate its adherence by both using the appropriate Compliance Mark¹⁴ and referring to the Public Register of the EU Cloud CoC¹⁵ to enable Customers to verify the validity of adherence.

4 Assessment of declared services by SAP (see 2.)

4.1 Fact Finding

Following the declaration of adherence of SAP SE (**SAP**), the Monitoring Body provided SAP with a template, requesting SAP to detail its compliance with each of the Controls of the EU Cloud CoC.

As this declaration is a renewal¹⁶, the Monitoring Body requested from SAP a confirmation that there has been no material change to the applicable technical and organisational and contractual framework. The Monitoring Body also requested from SAP a comparison of the declared Cloud Services of last year and this year as well as to explicitly indicate any Cloud Services that are no longer included in the Declaration of Adherence and, where applicable, provide the Monitoring Body with adequate

¹⁴ <https://eucoc.cloud/en/public-register/levels-of-compliance/>

¹⁵ <https://eucoc.cloud/en/public-register/>

¹⁶ You can access the Verification Report of previous year via the following link: [SAP Verification Report \(2025\)](#)

reasons. To the extent the list of Cloud Services was extended, the Monitoring Body requested a confirmation, that any such additional Cloud Services are subject to the same technical, organisational and contractual framework as the original Cloud Services.

SAP promptly responded to the templates. Information provided consisted of references and list of actual measures meeting the requirements of each Control, a free text answer describing their measures, and a reference to third party audits and certifications, where applicable. This information was completed by the confirmations requested by the Monitoring Body as well as a detailed comparison of the declared Cloud Services between last year and this year verification highlighting the changes and the reasons for them.

4.2 Selection of Controls for in-depth assessment

Following the provisions of the Code and the Assessment Procedure applicable to the EU Cloud CoC¹⁷, the Monitoring Body analysed the responses and information provided by SAP.

SAP's declared services have been externally certified and audited. SAP holds an ISO 27001 certificate, which is valid for the duration of the Declaration of Adherence, and the scope of registration includes all the declared services. The declaration of adherence referred to the respective ISO certification within the responses to Section 6 of the Code (IT Security). As provided by the Code, the Monitoring Body may consider third-party certifications and audits. Accordingly, the Monitoring Body verified the certification and references. Further in-depth checks were not performed, as provided third-party certifications adequately indicated compliance.

4.3 Examined Controls and related findings by the Monitoring Body

4.3.1 Examined Controls

The Monitoring Body reviewed the submission from SAP which outlined how all the requirements of the Code were met by SAP's implemented measures. In line with the Monitoring Body's process outlined in Section 3.4, the Monitoring Body selected a subset of Controls from the Code for in-depth scrutiny. In-depth scrutiny reflects sample taking and follow-up questions, whilst the latter may address requests for clarifications or more detailed information. The Controls selected for this level of review were: 5.1.A, 5.1.E-F, 5.3.C-E, 5.4.A, 5.5.A, 5.5.C, 5.5.E, 5.7.C-D, 5.7.F, 5.9.B, 5.12.A, 5.12.D, 5.14.B, 6.1.C, 6.2.I, 6.2.P and 6.3.A.

¹⁷ <https://eucoc.cloud/en/about/about-eu-cloud-coc/applicable-procedures/>

4.3.2 Findings by the Monitoring Body

During the process of verification, SAP consistently prepared the Declaration of Adherence well and thoroughly. SAP's responses were detailed and never created any impression of intentional non-transparency. Requests for clarification, additional and supporting information, as well as relevant samples were promptly dealt with and always met the deadlines set by the Monitoring Body.

Related to the Monitoring Body's requests (see section 4.1), SAP indicated that no relevant changes to the Cloud Service Family were applied in regards of the implemented technical, organisational and contractual framework. Where additional Cloud Services were added, SAP provided explicit confirmation that such Cloud Services belong to the same Cloud Service Family.

SAP has indicated that a Cloud Service Agreement ("CSA") is in place with Customers, incorporating the data protection obligations under the GDPR as a minimum. The CSA determines the responsibilities of the Customers and the CSP regarding the security measures, the terms under which the Customer Personal Data shall be processed, and the scope of Customer's instructions.

A first area of focus was the subprocessor management process. Based on the information provided, SAP has implemented procedures to ensure that it only engages subprocessors that provide sufficient guarantees of compliance with the GDPR. The process involves a mandatory risk assessment prior to the signing of any contract, along with continuous monitoring and outreach carried out by a dedicated team after the initial assessment. Additionally, SAP has implemented procedures to ensure that the same data protection obligations and appropriate technical and organisational measures, as provided by SAP to the Customers, are flown down throughout the full subprocessing chain. Moreover, SAP makes available to the Customer, through its contractual documentation and dedicated subprocessors webpage, general information regarding its existing subprocessors and the jurisdictions applicable to the processing of Customer Personal Data.

The Monitoring Body also assessed Customers' Audit Rights. The CSP makes certificates, attestations and reports readily available on its website. In the same vein, SAP makes available to Customers an executive summary of independent third-party audits through its Trust Center. The DPA defines the audit request procedures (e.g., the notice period). The cost determination and allocation related to Customers' Audit Rights were also presented to the Monitoring Body. There was no indication that such costs were prohibitive or excessive.

When it comes to assistance provided to the Customers, SAP has indicated that Customers can make use of various self-service capabilities to access all relevant information and manage data subject

requests (“DSRs”), including data retention, deletion, and the retrieval and export of Customer Personal Data in a machine-readable, commonly used, and structured format. In addition, SAP confirmed that Customers have access to documentation that includes information on data formats, processes, technical requirements and timeframes of retrieving the entrusted Customer Personal Data.

In a different vein, SAP has established documented procedures to assist Customers with Data Protection Impact Assessments (“DPIAs”). Relevant documentation is available in the CSP’s Trust Center, and in case additional support is needed, Customers can reach out to the dedicated team by raising a ticket. SAP has implemented relevant internal policies and procedures to ensure that the information provided to Customers in support of their DPIAs does not create a security risk for the CSP. Furthermore, SAP has established and made available to Customers communication channels by which the Customer may address its questions and requests regarding data protection measures.

Confidentiality obligations have also been part of the assessment. SAP confirmed that confidentiality obligations for employees and contractors are in place, and these continue after the end of employment or termination of the respective agreements. The Monitoring Body confirmed that SAP employees are required to complete general privacy and security-awareness trainings on a regular basis, while additional training is also provided to employees, based on their role and level of expertise. In addition to this, dedicated teams hold info sessions, to share best practices and relevant material with CSP’s personnel.

5 Conclusion

The information provided by SAP was consistent. Where necessary, SAP gave additional information or clarified their given information appropriately.

The Monitoring Body therefore verifies the services as compliant with the EU Cloud CoC based on the performed assessment as prescribed in 1. The service(s) will be listed in the Public Register of the EU Cloud CoC¹⁸ alongside this report.

In accordance with sections 3.4.1.2 and 3.4.2 and given the type of information provided by SAP to support the compliance of its service, the Monitoring Body grants SAP with a Second Level of Compliance.

¹⁸ <https://eucoc.cloud/en/public-register/>

6 Validity

This verification is valid for one year. The full report consists of 13 pages in total, whereof this is the last page closing with the Verification-ID. Please refer to the table of contents at the top of this report to verify that the copy you are reading is complete, if you have not received the copy of this report via the Public Register of the EU Cloud CoC¹⁹.

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¹⁹ <https://eucoc.cloud/en/public-register/>